

McCUSKER, ANSELM, ROSEN & CARVELLI, PC.
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**Hearing date to be
determined by Court**

LAW OFFICES OF WILLIAM S. KATCHEN, LLC
210 Park Avenue, Suite 301
Florham Park, New Jersey 07932

Counsel for Cumberland Farms, Inc. and Gulf Oil Limited Partnership

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK**

In re:

MEDFORD DEVELOPMENT CORP.,
MOTOR PARKWAY ENTERPRISES, INC.,
AIRPORT DEVELOPMENT CORP.,
WHEELER DEVELOPMENT, LLC,
BRENTWOOD DEVELOPMENT CORP.,
SMITHTOWN DEVELOPMENT CORP.,
HOLBROOK DEVELOPMENT CORP.,
CARMAN DEVELOPMENT CORP.,
MAPLE AVENUE HAUPPAUGE DEV. CORP.,
PORT JEFFERSON DEVELOPMENT CORP.,
RONKONKOMA DEVELOPMENT CORP.,
ISLANDIA DEVELOPMENT CORP.,
OCEANSIDE ENTERPRISES, INC.,
ISLIP DEVELOPMENT CORP.,
WESTBURY ENTERPRISES, INC.,

Debtors.

Chapter 11

Case No.: 14-75666 (AST)
14-75667 (AST)
14-75683 (AST)
14-75668 (AST)
14-75669 (AST)
14-75670 (AST)
14-75671 (AST)
14-75672 (AST)
14-75674 (AST)
14-75675 (AST)
14-75676 (AST)
14-75677 (AST)
14-75678 (AST)
14-75679 (AST)
14-75680 (AST)

Hon. Alan S. Trust, U.S.B.J.

**NOTICE OF MOTION FOR ENTRY OF AN ORDER CONVERTING CASES
UNDER CHAPTER ELEVEN TO CASES UNDER CHAPTER SEVEN
PURSUANT TO 11 U.S.C. § 1112(b)**

PLEASE TAKE NOTICE that on a date to be determined by the Court, Cumberland Farms, Inc. ("Cumberland") and its subsidiary, Gulf Oil Limited Partnership ("Gulf"), though their

attorneys, McCusker, Anselmi, Rosen & Carvelli, P.C. and the law offices of William S. Katchen, LLC, shall move before the United States Bankruptcy Court for the Eastern District of New York, 290 Federal Plaza, Central Islip, New York 11722 for the entry of an Order pursuant to 11 U.S.C. § 1112(b) converting certain cases under Chapter Eleven to cases under Chapter Seven of the Bankruptcy Code.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief sought in the motion must conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, as modified by any administrative orders entered in this case, and be filed with the Bankruptcy Court electronically in accordance with General Order #462 by registered users of the Bankruptcy Court's electronic case filing system, and by all other parties in interest on a 3.5 inch disk, preferably in a Portable Document Format (PDF), Corel WordPerfect, Microsoft Word, DOS text or a scanned image file together with an accompanying hard copy designated for the Chambers of the Honorable Alan S. Trust, United States Bankruptcy Judge. Objections, if any, must be served upon: (i) the undersigned counsel to Cumberland Farms, Inc., and (ii) the Office of the United States Trustee, 560 Federal Plaza, Central Islip, New York 11722, to the attention of Alfred M. Dimino, Esq., so as to be actually received no later than 4:00 p.m. seven days prior to the date of the hearing of the Motion as determined by the Court, or the relief requested may be granted as unopposed.

PLEASE TAKE FURTHER NOTICE that oral argument is requested.

Respectfully submitted,

McCUSKER, ANSELM, ROSEN
& CARVELLI, P.C.

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By: /s/ Bruce S. Rosen
Bruce S. Rosen

Dated: January 13, 2015